

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 19-CR-227-1-JLS

JOSEPH BONGIOVANNI,

Defendant.

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**DEFENDANT JOSEPH BONGIOVANNI'S**  
**AMENDED EXPERT WITNESS LIST**

Defendant Joseph Bongiovanni, by and through his counsel, may call the following expert witnesses at the trial<sup>1</sup>:

1. **Jennifer L. Naso (Forensic Document Examiner)**, Westchester, NY. Jennier Naso is a forensic document examiner associated with Riley Welch LaPorte & Associates. Ms. Naso conducted analysis of documents that government witnesses David Leary and Mark Gentile claim to contain “forged” versions their signatures. Ms. Naso will testify to her analysis of those signatures, Leary’s and Gentile’s signature exemplars, and her opinions regarding those signatures. Ms. Naso holds a B.A. in Psychology from Yale University and a Master’s in Forensic Science from the University of New Haven. She has served as a Document Analyst for the Connecticut State Forensics Laboratory and the United States Secret Service and a Forensic Document Examiner for Riley Welch LaPorte & Associates. Ms. Naso is a Diplomat of the American Board of Forensic Document Examiners (ABFDE), a Member of the American Society of Questioned Document Examiners (ASQDE), and a Contributing Member of the Organization of Scientific Area Committees for Forensic Science (OSAC). (90 minutes)
2. **James Neumann (Jewelry Appraiser)**, Depew, NY. James Neumann is a jewelry appraiser and owner of S&E Jewelers. Mr. Neumann appraised two wrist watches for the defense: one (1) wrist watch purporting to be a Rolex and one (1) Invicta wrist watch. These watches are pictured in Government Exhibits 103-20 and 103-49. Mr. Neumann examined the two wristwatches to determine the authenticity of the time piece as well as the value. The defense expects Mr. Neuman to testify: 1) That the purported Rolex is not an authentic

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<sup>1</sup> Mr. Bongiovanni reserves his right to supplement this witness list based upon the proof the government introduces at trial as well as after Mr. Bongiovanni is able to review the protected materials. In addition, Mr. Bongiovanni hereby incorporates all of the witness listed on the government’s witness list into his witness list.



Rolex and has a current replacement cost of approximately \$200.00; and, 2) That the Invicta watch is authentic and has a current replacement cost/value of approximately \$239.00.

Dated: September 10, 2024  
Buffalo, New York

**SINGER LEGAL PLLC**

*Attorneys for Defendant Joseph Bongiovanni*

By: s/ Robert C. Singer, Esq.

Robert C. Singer, Esq.  
80 East Spring Street  
Williamsville, New York 14221  
(716) 222-3288  
rob@singerlegalpllc.com

**THE LAW OFFICE OF PARKER R. MACKAY**

*Attorneys for Defendant Joseph Bongiovanni*

By: s/ Parker R. MacKay, Esq.

Parker R. MacKay, Esq.  
3110 Delaware Avenue  
Kenmore, New York 14217  
(716) 803-8166  
parker@mackaylawoffice.com

**TO: United States Attorney's Office  
for the Western District of New York**  
*Counsel for Plaintiff United States of America*  
138 Delaware Avenue  
Buffalo, New York 14202  
(716) 843-5700